

**REMARKS**

Claims 1-24 are pending.

Claims 1-24 stand rejected.

Claims 1-24 are amended. No new matter has been added. Support for these amendments can be found, at least, within paragraphs [0026]-[0031] of the specification.

*Rejection of Claims under 35 U.S.C. § 103(a)*

Claims 1-4, 6-7, 9-12 and 20-22 stand rejected under 35 U.S.C. § 103(a) as purportedly being unpatentable over U.S. Patent No. 5,708,828 (“Coleman”) in view of U.S. Patent No. 5,446,880 (“Balgeman”). Applicants respectfully traverse this rejection.

Applicants respectfully submit that neither Coleman nor Balgeman, alone or in any combination, teach or suggest, at the very least, (1) integrating inventory location information from a plurality of source systems to synchronize a target system, (2) a synchronization that depends on an update corresponding to an inventory item at a plurality of the plurality of source systems, and (3) such integrating that further uses at least one record from one of the plurality of source systems and another record from another of the plurality of source systems.

Coleman is cited as purportedly teaching the previously and currently claimed limitations covering “synchronizing”, “extracting”, and “converting.” See Office Action, p. 3. Without agreeing with the Office Action, Applicants respectfully submit that Coleman fails to teach or in any way suggest the newly recited limitations, as well as the existing limitations. Particularly, Coleman fails to disclose that any type of information is integrated from multiple source systems as part of synchronizing information stored at a target system with information stored at such source systems. Further, because Coleman fails to suggest any type of integration of information from more than one source system, it must follow that Coleman fails to teach, show, or suggest the related limitations. For example, the synchronization of information at a target system, depending on inventory updates corresponding to a single inventory item, with information stored at the plurality of source systems and integrating at least two records from different source systems employing different formats.

Applicants submit that Coleman's lack of teaching with regard to such limitations is due in part on that fact that the need to process data in a variety of formats typically stands as an obstacle to combining such varied data in any manner, much less doing so in a uniform fashion. As conceded by the Office Action, Coleman in particular, fails to contemplate inventory location information. Not only does Coleman suffer from this defect, Coleman more generally fails to consider any advantage that might stem from considering any characteristics of the information being migrated from system-to-system, and further fails to recognize benefits of the integration of information spread across multiple, disparate, source systems. Without considering any characteristics of the information being migrated, Coleman is incapable of recognizing the possibility of the claimed integration of inventory location information from multiple source systems in order to synchronize a target system with the integrated information.

Further, while Balgeman is cited as purportedly teaching inventory location information, an ordinary artisan would find no basis for arriving at the recited limitations by the introduction of Balgeman to Coleman. The claimed integration of inventory location information from multiple source systems after a conversion into a common format as part of synchronizing a target system cannot be an expected result of simply introducing the idea of inventory location information to Coleman. This is to say that, because Coleman fails to consider inventory location information and Balgeman fails to consider migrating data from a single system to another single system, there is no way that the combination can be arranged to produce any beneficial consequence, much less one that provides for integrating information from a plurality of source systems with a target system. The claimed integrating of inventory location information from multiple source systems as part of the integrated information being synchronized with a target system simply cannot be deduced from two references that are completely silent on the integration of information.

In addition to the above distinctions, dependent claim 4 recites further distinguishing limitations. Particularly, claim 4 recites that for each of the plurality of source systems from which inventory location information is extracted, less than all of the source inventory location information will be extracted. Such features provide improved efficiency, based in part on the recognition that not all information from one system will necessarily be needed by another system. For example, in the manner described in the specification, a front-office system might be focused on a function different from that of a back-office system. In such a case, there is no need for both of these systems to synchronize every aspect of their respectively managed inventory

location information. Both Coleman and Balgeman are completely silent on a synchronization process that extracts only part of the available inventory location information managed by a plurality of source systems. Thus, there is no way of characterizing Coleman and Balgeman as teaching, suggesting, or showing features such as those comprehended by the recited limitations.

For at least these reasons, Applicants submit that neither Coleman nor Balgeman, alone or in combination, provide disclosure of all the limitations of independent claims 1 and 9, and all claims depending therefrom, and that these claims are in condition for allowance. Applicants therefore respectfully request the Examiner's reconsideration and withdrawal of the rejections to these claims.

Claims 5, 8, 13-19, 23 and 24 stand rejected under 35 U.S.C. § 103(a) as purportedly being unpatentable over Coleman in view of Balgeman as applied to claims 1-4, 6-7, 9-12, and 20-22 above, and further in view of U.S. Publication No. 2004/0039576 ("He"). Applicants respectfully traverse this rejection.

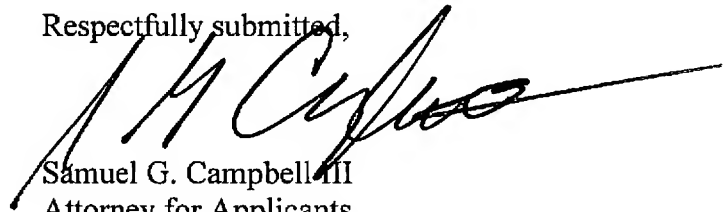
Claims 5 and 8 depend on independent claim 1, and claims 13-19, 23, and 24 depend on independent claim 9. Applicants respectfully submit that dependent claims 5, 8, 13-19, 23 and 24 are in condition for allowance for at least the foregoing reasons set forth with respect to the independent claims. Applicants therefore respectfully request the Examiner's reconsideration and withdrawal of the rejections to these claims.

**CONCLUSION**

In view of the amendments and remarks set forth herein, the application and the claims therein are believed to be in condition for allowance without any further examination and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is invited to telephone the undersigned.

If any extensions of time under 37 C.F.R. § 1.136(a) are required in order for this submission to be considered timely, Applicants hereby petition for such extensions. Applicants also hereby authorize that any fees due for such extensions or any other fee associated with this submission, as specified in 37 C.F.R. § 1.16 or § 1.17, be charged to Deposit Account 502306.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'S. G. Campbell III', is written over the typed name.

Samuel G. Campbell III

Attorney for Applicants

Reg. No. 42,381

Telephone: (512) 439-5084

Facsimile: (512) 439-5099